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15	UNITED STATES BA	NKRUPTCY COURT
16	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION	
17		
18	In re	Case No. 23-30564
19	THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,	Chapter 11
20	Debtor and	NOTICE OF HEARING ON DEBTOR'S MOTION TO EXTEND DEADLINE TO
21	Debtor in Possession.	ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL
22		PROPERTY PURSUANT TO SECTION 365(d)(4) OF THE BANKRUPTCY CODE
23		Date: December 14, 2023
24		Time: 1:30 p.m.
25		Location: Via ZoomGov Judge: Hon. Dennis Montali
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27	///	
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Notice of Hearing on Motion for extension of Deadline Case: 23-30564 Doc# 315 Filed: 11/16/23 Entered: 11/16/23 15:12:38 Page 1 of 4

NOTICE IS HEREBY GIVEN that The Roman Catholic Archbishop of San Francisco, Debtor and Debtor-in-Possession herein ("Debtor"), has filed a *Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* (the "Motion") and that a hearing on the Motion is scheduled before the Honorable Dennis Montali on December 14, 2023, at 1:30 p.m. at the United States Bankruptcy Court, Northern District of California, San Francisco Division, before the Honorable Dennis Montali (the "Hearing"). The Hearing will not be conducted in the presiding judge's courtroom but instead will be conducted by videoconference via ZoomGov. The Bankruptcy Court's website provides information regarding how to arrange an appearance at a video or telephonic hearing. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website. The link to the judge's electronic calendar is: https://www.canb.uscourts.gov/judge/montali/calendar.

NOTICE IS FURTHER GIVEN that the Motion is supported by the *Declaration of Joseph J. Passarello in support of Chapter 11 Petition and First Day Motions* filed on August 21, 2023, at [ECF No. 14] ("Passarello Background Decl."), the *Declaration of Paul Gaspari in Support of Chapter 11 Petition and First Day Motions* filed on August 21, 2023 at [ECF No. 15] ("Gaspari Decl."), and the additional *Declaration of Joseph Passarello in support of this Motion*, the pleadings and papers on file in this case, and such other evidence and argument as may be submitted before or during the Hearing on the Motion.

By the Motion, the Debtor seeks, pursuant to section 365(d)(4) of title 11 of the United States Code (the "Bankruptcy Code") to extend the current deadline of December 19, 2023, to assume or reject all unexpired leases of nonresidential real property (the "Assumption/Rejection Deadline") by ninety (90) days, up to and including March 18, 2024.

The Debtor is a party to the leases identified in Schedule G of the Debtor's Schedules (the "<u>Unexpired Leases</u>") filed as Docket No. 152 and seeks an extension of the Assumption/Rejection Deadline for all unexpired leases of nonresidential real property, including but not limited to leases with Chesterton Academy of San Francisco, Children's Council of San Francisco, Cruise

LLC, Daughters of Charity, JEH Enterprises, Inc., the Cemeteries, Seneca Family of Agencies, the Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation, the Roman Catholic Seminary of San Francisco, and The Sleep Train, Inc./Mattress Firm.

Pursuant to section 365(d)(4) of the Bankruptcy Code, if the Unexpired Leases for which the Debtor is the lessee are not assumed or rejected on or prior to the Assumption/Rejection Deadline, such unexpired leases shall be deemed rejected unless the Debtor receives, pursuant to section 365(d)(4)(B)(i) of the Bankruptcy Code, an extension of time within which it may assume or reject the Unexpired Leases. In this case, there is sufficient cause to grant the Debtor's requested extension of time within which it may assume or reject any Unexpired Leases.

The Debtor is in the early stages of the case and working to build a foundation for a plan of reorganization. It is actively taking steps to develop a plan of reorganization with its constituents. Additional time is needed to fully evaluate the progress and dynamics of the case, and the potential effect of assumption or rejection of the lease under the unique circumstances of this case.

NOTICE IS FURTHER GIVEN that this notice does not contain all the particulars of the Motion or supporting documents, nor does it summarize all of the evidence submitted in support. For further specifics concerning the Motion and the relief requested, you are encouraged to review the Motion and the supporting evidence, including the supporting Declarations, copies of which may be obtained from the website to be maintained by the Debtor's Claims Agent Omni Agent Solutions, Inc., at https://www.omniagentsolutions.com/RCASF. You may also access these documents from the Court's Pacer system (requires a subscription). The web page address for the United States Bankruptcy Court for the Northern District of California is <a href="http://www.canb.uscourts.gov">http://www.canb.uscourts.gov</a>.

The Bankruptcy Court's website provides information regarding how to arrange a telephonic or video appearance. Counsel, parties and other interested parties may attend the hearing in person or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's website. Information on attending the hearing by Zoom will be provided on

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Judge Montali's calendar posted on the court's website. The link to the judge's electronic 1 calendar is: https://www.canb.uscourts.gov/judge/montali/calendar. 2 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be 3 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-4 referenced addresses so as to be received by November 30, 2023. Any opposition or response 5 must be filed and served on the Limited Service List as provided on the Omni website. The 6 updated Limited Service List may also be obtained from the Omni website listed above. Failure 7 to file timely opposition and appear at the hearing may constitute a waiver of your objections. 8 9 Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish 10 to consult one. 11 12 Dated: November 16, 2023 FELDERSTEIN FITZGERALD WILLOUGHBY PASCUZZI & RIOS LLP 13 14 By: /s/ Jason E. Rios PAUL J. PASCUZZI 15 JASON E. RIOS THOMAS R. PHINNEY 16 Attorneys for The Roman Catholic Archbishop of 17 San Francisco 18 19 Dated: November 16, 2023 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 20 By: /s/ Ori Katz 21 ORI KATZ ALAN H. MARTIN 22 Attorneys for The Roman Catholic Archbishop of 23 San Francisco 24 25 26 27 28

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